

CHANGE REQUEST COVER SHEET

Change Request Number: 13-48

Date Received: 2/19/2013

Title: Anti-Counterfeiting - Additional Guidance

Name: Tim Eckert

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Policy OR Guidance: Guidance

Section/Text Location Affected: T3.2.2.7

Summary of Change: Additional guidance regarding caution in purchasing spare parts from other than a known supplier or distributor

Reason for Change: Increased emphasis on keeping counterfeit DoD spare parts out of the FAA supply chain

Development, Review, and/or Concurrence: Acquisition Policy Division, Procurement Legal, Contracting Organizations at Headquarters, Centers, and Regions.

Target Audience: Technical Operations, Logistics Center, and Contracting Workforce

Potential Links within FAST for the Change: None

Briefing Planned: No

ASAG Responsibilities: None

Potential Links within FAST for the Change: None

Links for New/Modified Forms (or) Documents (LINK 1) [null](#)

Links for New/Modified Forms (or) Documents (LINK 2) [null](#)

Links for New/Modified Forms (or) Documents (LINK 3) [null](#)

SECTIONS EDITED:

Procurement Guidance:

T3.2.7 - Anti-Counterfeit Management

Anti-Counterfeit Management

Section 7 : Counterfeit Parts Control [[Old Content](#)][[New Content](#)] [[RedLine Content](#)]

SECTIONS EDITED:

Section 7 : Counterfeit Parts Control

Old Content: Procurement Guidance:

T3.2.7 - Anti-Counterfeit Management

Anti-Counterfeit Management

Section 7 : Counterfeit Parts Control

a. Procurement Process

(1) To minimize the risk of receiving counterfeit parts, purchasing parts from the Original Equipment Manufacturer (OEM) or the Original Component Manufacturer (OCM) is encouraged if parts are available. OCM-authorized suppliers (e.g., franchised distributors), and authorized aftermarket manufacturers have a low risk of supplying non-authentic parts.

(2) In order to minimize the risk of receiving counterfeit parts when purchasing from brokers, distributors and aftermarket manufacturers, procurement teams may consider requiring the contractor to provide traceability to the origin of the parts

(3) Diminishing Manufacturing Sources and Material Shortages (DMSMS) and parts obsolescence can be contributing factors to the reason why counterfeit parts are made and placed on the market for sale. DMSMS is the loss or pending loss of manufacturers or suppliers of critical items and new materials due to discontinuance of production.

b. Parts Detection

(1) Prior to the acceptance of the parts and/or equipment by the FAA, parts detection is in accordance with applicable contract quality assurance requirements. After acceptance, parts detection is the FAA's responsibility.

(2) Detecting counterfeit and nonconforming microcircuit, electrical and mechanical parts is an ongoing process. Counterfeit parts can impact the safety of a user's application of parts and product reliability. Common and basic aspects leading to the suspicion of counterfeit, defective, and nonconforming parts are:

- A pattern of parts rejected by Quality Assurance;
- Devices that will not program correctly;
- Components that have been reworked by an unknown third party;

- The trademark part sold by an unauthorized distributor;
- Original certification of traceability that are unavailable;
- Parts that are obsolete and no longer manufactured;
- Outside package indicates onset of corrosion;
- Failed performance testing data;
- Parts with failed solderability;
- Independent laboratories rejection of parts after reviewing failed vendor analysis;
- Markings indicate parts:
 - Resurfaced and/or sanded
 - Remarked
 - Inconsistencies in physical external figures or markings
 - Discrepancies in lot and/or date codes
- Leads on components show evidence of:
 - Previous use
 - Previous refurbishment
 - Moisture damage and/or oxidation

c. Parts Reporting

(1) Prior to acceptance of the parts and/or equipment by the FAA, suspected counterfeit parts reporting is in accordance with the applicable contract quality assurance requirements.

(2) After acceptance of the parts and/or equipment by the FAA, suspected counterfeit parts are reported to the FAA's Government Industry Data Exchange Program (GIDEP) Coordinator (AAP-120) for the purpose of contacting the proper Agency organization that is responsible for cases related to suspected fraud.

(3) The GIDEP Coordinator may prepare a GIDEP Agency Action Notice and a GIDEP Alert for suspected counterfeit parts information that can be shared with GIDEP members.

(4) Suspected Unapproved Parts (SUPs) and suspected counterfeit parts may be reported via the toll-free FAA hotline at 1-800-255-1111.

New Content: Procurement Guidance:

T3.2.7 - Anti-Counterfeit Management

Anti-Counterfeit Management

Section 7 : Counterfeit Parts Control

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(4) When procuring maintenance parts for legacy ground equipment, avoid purchases from unknown and frequently suspect counterfeit parts suppliers. Obsolete military parts could be a source for suspected counterfeit parts to enter the FAA supply chain.

(5) Guidance on detecting suspected counterfeit parts is in section b below.

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Red Line Content: Procurement Guidance:

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